

# EXHIBIT 1

A. Plaintiffs respectfully request that the Court deem “authentic” for purposes of satisfying Rule 901 of the Federal Rules of Evidence any documents Plaintiffs have a good faith basis to believe were in fact created by Defendant Vanguard, including, but not limited to:

1. Discord – Dillon1488
2. Discord – White-PowerStroke
3. Discord – WhitePower\_Stroke (Discord ID: 375095101719838723)
4. Discord – White-PowerStroke(Dillon) (Discord ID: 200103874801958912)
5. Discord– White\_PowerStroke(Dillon) (Discord ID: 329868457824878593)
6. Discord - White-PowerStroke(Dillon)#6190
7. Discord – White-PowerStroke(Dillon)#2615
8. Discord – UncleBob#6190
9. Discord – Thomas Ryan (Discord ID: 255039575758602240)
10. Discord – Thomas Ryan (Discord ID: 363070228864696330)
11. Discord – Commander#770
12. Email – Dillon\_hopper@protonmail.com
13. Email – AmericanVFinance@gmail.com
14. Email – VanAmAdmin@protonmail.com
15. Email – AmericanVanguardIndiana@tutamail.com
16. Email – duhizzlemanizzle@gmail.com
17. Email – Thomasrousseau98
18. Email – Tutanota
19. Facebook – vanguard.america
20. Gab – WomenofVanguard
21. Gab – @WhitePowerStroke
22. Twitter – @VanAmOfficial

- 23. Twitter – @VanguardAm
- 24. Twitter – @VanAmOfficial
- 25. Twitter – @TrueAmVanguard
- 26. Twitter – @Vanguard\_Indy
- 27. Daily Stormer – Lauburu
- 28. Iron March – Lauburu88

B. Plaintiffs respectfully request that the Court instruct the jury that Defendant Vanguard chose to intentionally withhold its documents and that the jury may draw adverse inferences from that fact, including that Vanguard chose to withhold such documents because it was aware that such documents contained evidence that Defendant Vanguard conspired to plan racially-motivated violence at the Unite the Right event.